REMARKS

This is a full and timely response to the outstanding final Office Action mailed July 12, 2005. Claims 1-46 remain pending in the present application. Reconsideration and allowance of the application and pending claims are respectfully requested.

1. Response To Rejections of Claims 1-6 and 10-20 Under 35 U.S.C. § 102

Claims 1-5, 7, 11-13, 18-23, 25-27, 29-35, 37-42, and 46 have been rejected under 35 U.S.C. § 102(e) as being anticipated by *Adamske* (U.S. Patent No. 6,615,234). Applicant respectfully traverses this rejection.

It is axiomatic that "[a]nticipation requires the disclosure in a single prior art reference of each element of the claim under consideration." *W. L. Gore & Associates, Inc. v. Garlock, Inc.*, 721 F.2d 1540, 1554, 220 USPQ 303, 313 (Fed. Cir. 1983). Therefore, every claimed feature of the claimed subject matter must be represented in the applied reference to constitute a proper rejection under 35 U.S.C. § 102(e). In the present case, not every feature of the claimed subject matter is represented in the *Adamske* reference. Applicant discusses the *Adamske* reference and Applicant's claims in the following.

a. Claim 1

As provided in independent claim 1, Applicant claims:

> From a client program in a web-based environment, a method for controlling production and display of an image represented by data generated at a source service, said data representing at least in part a predetermined graphic symbol referencing a particular symbol set, said method comprising the steps of:
> accessing said source service;
> dynamically generating a printable version of said image represented by said data at said source service under interactive control of said client program, said printable version including said predetermined graphic symbol referencing said particular symbol set;
> referencing said printable version of said image represented by said data from a composition stored in an imaging store;
> accessing said composition from a destination service; and
> if said destination service contains said particular symbol set and if said destination service is instructed to produce said printable version of said represented image, then forwarding said printable version of said represented image to said destination service and then producing said represented image including said predetermined graphic symbol under interactive control by said client program, *wherein said particular symbol set identifies mapping*

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characteristics for producing said predetermined graphic symbol on said
represented image.

(Emphasis added).

Applicants respectfully submit that independent claim 1 is allowable for at least the reason that *Adamske* does not disclose, teach, or suggest at least "wherein said particular symbol set identifies mapping characteristics for producing said predetermined graphic symbol on said represented image," as recited and emphasized above in claim 1.

Rather, *Adamske* discloses at most a system where a "Signature database 62 is connected to signature server 60 and contains a set of identifying information for each signatory, including a pass phrase, a user ID, and an on-line signature. The signatures for each individual signatory can be scanned into and electronically stored in signatory database 62 (optionally, in an encrypted format)." Col. 8, lines 24-45. As such, *Adamske* fails to teach or suggest at least "wherein said particular symbol set identifies mapping characteristics for producing said predetermined graphic symbol on said represented image," as recited in claim 1, since a signature is stored as an image file in *Adamske* and is not mapped in accordance with a particular symbol set.

Therefore, *Adamske* does not teach or suggest at least all of the claimed features of claim 1. Therefore, claim 1 is not anticipated by *Adamske*, and the rejection should be withdrawn for at least this reason alone.

  b.   Claims 2-5, 7, 11-13, and 18-23

Because independent claim 1 is allowable over the cited art of record, dependent claims 2-5, 7, 11-13, and 18-23 (which depend from independent claim 1) are allowable as a matter of law for at least the reason that dependent claims 2-5, 7, 11-13, and 18-23 contain all the steps and features of independent claim 1. For at least this reason, the rejections of claims 2-5, 7, 11-13, and 18-23 should be withdrawn.

Additionally and notwithstanding the foregoing allowability of claims 2-5, 7, 11-13, and 18-23, these claims recite further features and/or combinations of features (as is apparent by examination of the claim itself) that are patentably distinct from the cited art of record. Hence, there are other reasons why these dependent claims are allowable.

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c.   **Claim 25**

As provided in independent claim 25, Applicant claims:

A system for controlling printing and display of an image in a distributed computing environment, comprising:

a first computer;

a second computer accessible from said first computer and operable to provide a first executable content to said first computer in response to a request from said first computer;

said second computer further operable to dynamically generate and display a printable version of data representing said image under the interactive control of said first computer via said first executable content, said represented image comprising at least in part a predetermined graphic symbol referencing a particular symbol set;

an imaging store accessible from said second computer and operable to access and store a composition referencing said printable version of said data; and

at least one destination computer accessible from said first computer and operable to access said composition, said destination computer representing a production device, such that, if said at least one said destination computer contains said particular symbol set, then said production device represented by said at least one said destination computer is operable to produce said represented image including printing said predetermined graphic symbol under interactive control of said first computer, *wherein said particular symbol set identifies mapping characteristics for producing said predetermined graphic symbol on said represented image.*

(Emphasis added).

Applicants respectfully submit that independent claim 25 is allowable for at least the reason that *Adamske* does not disclose, teach, or suggest at least "wherein said particular symbol set identifies mapping characteristics for producing said predetermined graphic symbol on said represented image," as recited and emphasized above in claim 25.

Rather, *Adamske* discloses at most a system where a "Signature database 62 is connected to signature server 60 and contains a set of identifying information for each signatory, including a pass phrase, a user ID, and an on-line signature. The signatures for each individual signatory can be scanned into and electronically stored in signatory database 62 (optionally, in an encrypted format)." Col. 8, lines 24-45. As such, *Adamske* fails to teach or suggest at least "wherein said particular symbol set identifies mapping characteristics for producing said predetermined graphic symbol on said represented image," as recited in claim 25, since a signature is stored as an image file in *Adamske* and is not mapped in accordance with a particular symbol set.

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Therefore, *Adamske* does not teach or suggest at least all of the claimed features of claim 25. Therefore, claim 25 is not anticipated by *Adamske*, and the rejection should be withdrawn for at least this reason alone.

d.   Claims 26-27, 29-35, and 37

Because independent claim 25 is allowable over the cited art of record, dependent claims 26-27, 29-35, and 37 (which depend from independent claim 25) are allowable as a matter of law for at least the reason that dependent claims 26-27, 29-35, and 37 contain all the elements and features of independent claim 25. For at least this reason, the rejections of claims 26-27, 29-35, and 37 should be withdrawn.

Additionally and notwithstanding the foregoing allowability of claims 26-27, 29-35, and 37, these claims recite further features and/or combinations of features (as is apparent by examination of the claim itself) that are patentably distinct from the cited art of record. Hence, there are other reasons why these dependent claims are allowable.

e.   Claim 38

As provided in independent claim 38, Applicant claims:

> In a distributed computing environment, a computer for controlling production and display of an image represented by data generated at a source service, said data representing at least in part a predetermined graphic symbol referencing a particular symbol set, said computer operable to:
> access said source service;
> interactively direct said source service to dynamically generate a printable version of said represented image, said printable version including said predetermined graphic symbol referencing said particular symbol set;
> reference said printable version of said represented image via a composition stored in an imaging store;
> access a destination service; and
> if said destination service contains said particular symbol set, then interactively directing said destination service exclusively to access and produce said printable version of said represented image, including said predetermined graphic symbol, *wherein said particular symbol set identifies mapping characteristics for producing said predetermined graphic symbol on said represented image*.

(Emphasis added).

Applicants respectfully submit that independent claim 38 is allowable for at least the reason that *Adamske* does not disclose, teach, or suggest at least "wherein said particular

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symbol set identifies mapping characteristics for producing said predetermined graphic symbol on said represented image," as recited and emphasized above in claim 38.

Rather, *Adamske* discloses at most a system where a "Signature database 62 is connected to signature server 60 and contains a set of identifying information for each signatory, including a pass phrase, a user ID, and an on-line signature. The signatures for each individual signatory can be scanned into and electronically stored in signatory database 62 (optionally, in an encrypted format)." Col. 8, lines 24-45. As such, *Adamske* fails to teach or suggest at least "wherein said particular symbol set identifies mapping characteristics for producing said predetermined graphic symbol on said represented image," as recited in claim 38, since a signature is stored as an image file in *Adamske* and is not mapped in accordance with a particular symbol set.

Therefore, *Adamske* does not teach or suggest at least all of the claimed features of claim 38. Therefore, claim 38 is not anticipated by *Adamske,* and the rejection should be withdrawn for at least this reason alone.

f.   Claims 39-42 and 46

Because independent claim 38 is allowable over the cited art of record, dependent claims 39-42 and 46 (which depend from independent claim 38) are allowable as a matter of law for at least the reason that dependent claims 39-42 and 46 contain all the steps and features of independent claim 38. For at least this reason, the rejections of claims 39-42 and 46 should be withdrawn.

Additionally and notwithstanding the foregoing allowability of claims 39-42 and 46, these claims recite further features and/or combinations of features (as is apparent by examination of the claim itself) that are patentably distinct from the cited art of record. Hence, there are other reasons why these dependent claims are allowable.

2.   Response To Rejections of Claims Under 35 U.S.C. § 103

Claims 6, 8, 14-16, 24, 28, and 43 have been rejected under 35 U.S.C. § 103(a) as being unpatentable over *Adamske* in view of *Powers* (U.S. Patent No. 6,438,584). Further, claims 9, 10, 17, 36, 44, and 45 have been rejected under 35 U.S.C. § 103(a) as being unpatentable over *Adamske* in view of *Powers* in further view of *Shima* (U.S. Patent No. 6,369,909) It is well-established at law that, for a proper rejection of a claim under 35 U.S.C. § 103 as being obvious based upon a combination of references, the cited combination of references must disclose,

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teach, or suggest, either implicitly or explicitly, all elements/features/steps of the claim at issue. *See, e.g., In Re Dow Chemical*, 5 U.S.P.Q.2d 1529, 1531 (Fed. Cir. 1988), and *In re Keller*, 208 U.S.P.Q.2d 871, 881 (C.C.P.A. 1981). Applicants respectfully traverse this rejection.

Applicants submit that *Adamske* does not teach or suggests all of the claimed features of independent claims 1, 25, and 38 as previously discussed. Further, the Office Action fails to introduce and cite art that cures the deficiencies of the *Adamske* reference. Thus, claims 6, 8-10, 14-17, 24, 28, 36, and 43-45 (which depend from respective independent claims 1, 25, and 38) are allowable over *Adamske* in view of the cited art for at least this reason.

Additionally and notwithstanding the foregoing allowability of claims 6, 8-10, 14-17, 24, 28, 36, and 43-45, these claims recite further features and/or combinations of features (as is apparent by examination of the claim itself) that are patentably distinct from the cited art of record. Hence, there are other reasons why these dependent claims are allowable.

CONCLUSION

For at least the reasons set forth above, Applicants respectfully submit that all objections and/or rejections have been traversed, rendered moot, and/or accommodated, and that the pending claims are in condition for allowance. Favorable reconsideration and allowance of the present application and all pending claims are hereby courteously requested. If, in the opinion of the Examiner, a telephonic conference would expedite the examination of this matter, the Examiner is invited to call the undersigned agent at (770) 933-9500.

Respectfully submitted,

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